OhioEPA

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

10/28/2013

Certified Mail

No	TOXIC REVIEW
No	SYNTHETIC MINOR TO AVOID MAJOR NSR
No	CEMS
No	MACT/GACT
No	NSPS
No	NESHAPS
No	NETTING
No	MODELING SUBMITTED
Yes	SYNTHETIC MINOR TO AVOID TITLE V
Yes	FEDERALLY ENFORCABLE PTIO (FEPTIO)
No	SYNTHETIC MINOR TO AVOID MAJOR GHG

JAMES SHOLLENBERGER
OmniSource Corporation
2453 HILL AVE
TOLEDO, OH 43607

RE: FINALAIR POLLUTION PERMIT-TO-INSTALL AND OPERATE
Facility ID: 0448011189
Permit Number: P0115447
Permit Type: Renewal
County: Lucas

Dear Permit Holder:

Enclosed please find a final Ohio Environmental Protection Agency (EPA) Air Pollution Permit-to-Install and Operate (PTIO) which will allow you to install, modify, and/or operate the described emissions unit(s) in the manner indicated in the permit. Because this permit contains conditions and restrictions, please read it very carefully. In this letter you will find the information on the following topics:

- **How to appeal this permit**
- **How to save money, reduce pollution and reduce energy consumption**
- **How to give us feedback on your permitting experience**
- **How to get an electronic copy of your permit**

How to appeal this permit

The issuance of this PTIO is a final action of the Director and may be appealed to the Environmental Review Appeals Commission pursuant to Section 3745.04 of the Ohio Revised Code. The appeal must be in writing and set forth the action complained of and the grounds upon which the appeal is based. The appeal must be filed with the Commission within thirty (30) days after notice of the Director's action. The appeal must be accompanied by a filing fee of $70.00, made payable to “Ohio Treasurer Josh Mandel," which the Commission, in its discretion, may reduce if by affidavit you demonstrate that payment of the full amount of the fee would cause extreme hardship. Notice of the filing of the appeal shall be filed with the Director within three (3) days of filing with the Commission. Ohio EPA requests that a copy of the appeal be served upon the Ohio Attorney General’s Office, Environmental Enforcement Section. An appeal may be filed with the Environmental Review Appeals Commission at the following address:

Environmental Review Appeals Commission
77 South High Street, 17th Floor
Columbus, OH 43215

How to save money, reduce pollution and reduce energy consumption

The Ohio EPA is encouraging companies to investigate pollution prevention and energy conservation. Not only will this reduce pollution and energy consumption, but it can also save you money. If you would like to learn ways you can save money while protecting the environment, please contact our Office of Compliance Assistance and Pollution Prevention at (614) 644-3469. Additionally, all or a portion of the capital expenditures related to installing air pollution control equipment under this permit may be eligible for financing and State tax exemptions through the Ohio Air Quality Development Authority (OAQDA) under Ohio Revised Code Section 3706. For more information, see the OAQDA website: www.ohioairquality.org/clean_air

How to give us feedback on your permitting experience

Please complete a survey at www.epa.ohio.gov/survey.aspx and give us feedback on your permitting experience. We value your opinion.

How to get an electronic copy of your permit

This permit can be accessed electronically via the eBusiness Center: Air Services in Microsoft Word format or in Adobe PDF on the Division of Air Pollution Control (DAPC) Web page, www.epa.ohio.gov/dapc by clicking the "Search for Permits" link under the Permitting topic on the Programs tab.

If you have any questions, please contact Toledo Department of Environmental Services at (419)936-3015or the Office of Compliance Assistance and Pollution Prevention at (614) 644-3469.

Sincerely,

Michael W. Ahern

Michael W. Ahern, Manager
Permit Issuance and Data Management Section, DAPC

Cc: TDES

FINAL

Division of Air Pollution Control
Permit-to-Install and Operate
for
OmniSource Corporation

Facility ID:	0448011189
Permit Number:	P0115447
Permit Type:	Renewal
Issued:	10/28/2013
Effective:	10/28/2013
Expiration:	10/25/2018

Division of Air Pollution Control
Permit-to-Install and Operate
for
OmniSource Corporation

Table of Contents

Authorization

Facility ID: 0448011189
Application Number(s): A0048789
Permit Number: P0115447
Permit Description: FEPTIO renewal permit for storage piles, material handling, torching, shredder and paint booth.
Permit Type: Renewal
Permit Fee: $0.00
Issue Date: 10/28/2013
Effective Date: 10/28/2013
Expiration Date: 10/25/2018
Permit Evaluation Report (PER) Annual Date: Apr 1 - Mar 31, Due May 15

This document constitutes issuance to:

OmniSource Corporation
5000 N. DETROIT AVE
TOLEDO, OH 43612

of a Permit-to-Install and Operate for the emissions unit(s) identified on the following page.

Ohio Environmental Protection Agency (EPA) District Office or local air agency responsible for processing and administering your permit:

Toledo Department of Environmental Services
348 South Erie Street
Toledo, OH 43604
(419)936-3015

The above named entity is hereby granted this Permit-to-Install and Operate for the air contaminant source(s) (emissions unit(s))listed in this section pursuant to Chapter 3745-31 of the Ohio Administrative Code. Issuance of this permit does not constitute expressed or implied approval or agreement that, if constructed or modified in accordance with the plans included in the application, the described emissions unit(s) will operate in compliance with applicable State and federal laws and regulations.

This permit is granted subject to the conditions attached hereto.

Ohio Environmental Protection Agency

Scott J. Nally
Director

Authorization (continued)

Permit Number: P0115447
Permit Description: FEPTIO renewal permit for storage piles, material handling, torching, shredder and paint booth.

Permits for the following Emissions Unit(s) or groups of Emissions Units are in this document as indicated below:

Emissions Unit ID:	**F002**
Company Equipment ID:	Storage Piles
Superseded Permit Number:	P0103626
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F003**
Company Equipment ID:	Material Handling
Superseded Permit Number:	P0103630
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F004**
Company Equipment ID:	Torching Stations
Superseded Permit Number:	P0103630
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**F005**
Company Equipment ID:	Shredder
Superseded Permit Number:	P0103630
General Permit Category and Type:	Not Applicable
Emissions Unit ID:	**K001**
Company Equipment ID:	Spray Booth
Superseded Permit Number:	P0106968
General Permit Category and Type:	Not Applicable

A. Standard Terms and Conditions

1. What does this permit-to-install and operate ("PTIO") allow me to do?

This permit allows you to install and operate the emissions unit(s) identified in this PTIO. You must install and operate the unit(s) in accordance with the application you submitted and all the terms and conditions contained in this PTIO, including emission limits and those terms that ensure compliance with the emission limits (for example, operating, recordkeeping and monitoring requirements).

2. Who is responsible for complying with this permit?

The person identified on the "Authorization" page, above, is responsible for complying with this permit until the permit is revoked, terminated, or transferred. "Person" means a person, firm, corporation, association, or partnership. The words "you," "your," or "permittee" refer to the "person" identified on the "Authorization" page above.

The permit applies only to the emissions unit(s) identified in the permit. If you install or modify any other equipment that requires an air permit, you must apply for an additional PTIO(s) for these sources.

3. What records must I keep under this permit?

You must keep all records required by this permit, including monitoring data, test results, strip-chart recordings, calibration data, maintenance records, and any other record required by this permit for five years from the date the record was created. You can keep these records electronically, provided they can be made available to Ohio EPA during an inspection at the facility. Failure to make requested records available to Ohio EPA upon request is a violation of this permit requirement.

4. What are my permit fees and when do I pay them?

There are two fees associated with permitted air contaminant sources in Ohio:

- PTIO fee.This one-time fee is based on a fee schedule in accordance with Ohio Revised Code (ORC) section 3745.11, or based on a time and materials charge for permit application review and permit processing if required by the Director.

  You will be sent an invoice for this fee after you receive this PTIO and payment is due within 30 days of the invoice date. You are required to pay the fee for this PTIO even if you do not install or modify your operations as authorized by this permit.

- Annual emissions fee.Ohio EPA will assess a separate fee based on the total annual emissions from your facility. You self-report your emissions in accordance with Ohio Administrative Code (OAC) Chapter 3745-78. This fee assessed is based on a fee schedule in ORC section 3745.11 and funds Ohio EPA's permit compliance oversight activities. For facilities that are permitted as synthetic minor sources, the fee schedule is adjusted annually for inflation. Ohio EPA will notify you when it is time to report your emissions and to pay your annual emission fees.

5. When does my PTIO expire, and when do I need to submit my renewal application?

This permit expires on the date identified at the beginning of this permit document (see "Authorization" page above) and you must submit a renewal application to renew the permit. Ohio EPA will send a renewal notice to you approximately six months prior to the expiration date of this permit. However, it is

very important that you submit a complete renewal permit application (postmarked prior to expiration of this permit) even if you do not receive the renewal notice.

If a complete renewal application is submitted before the expiration date, Ohio EPA considers this a timely application for purposes of ORC section 119.06, and you are authorized to continue operating the emissions unit(s) covered by this permit beyond the expiration date of this permit until final action is taken by Ohio EPA on the renewal application.

6. What happens to this permit if my project is delayed or I do not install or modify my source?

This PTIO expires 18 months after the issue date identified on the "Authorization" page above unless otherwise specified if you have not (1) started constructing the new or modified emission sources identified in this permit, or (2) entered into a binding contract to undertake such construction. This deadline can be extended by up to 12 months, provided you apply to Ohio EPA for this extension within a reasonable time before the 18-month period has ended and you can show good cause for any such extension.

7. What reports must I submit under this permit?

An annual permit evaluation report (PER) is required in addition to any malfunction reporting required by OAC rule 3745-15-06 or other specific rule-based reporting requirement identified in this permit. Your PER due date is identified in the Authorization section of this permit.

8. If I am required to obtain a Title V operating permit in the future, what happens to the operating provisions and PER obligations under this permit?

If you are required to obtain a Title V permit under OAC Chapter 3745-77 in the future, the permit-to-operate portion of this permit will be superseded by the issued Title V permit. From the effective date of the Title V permit forward, this PTIO will effectively become a PTI (permit-to-install) in accordance with OAC rule 3745-31-02(B). The following terms and conditions of this permit will no longer be applicable after issuance of the Title V permit: Section B, Term 1.b) and Section C, for each emissions unit, Term a)(2).

The PER requirements in this permit remain effective until the date the Title V permit is issued and is effective, and cease to apply after the effective date of the Title V permit. The final PER obligation will cover operations up to the effective date of the Title V permit and must be submitted on or before the submission deadline identified in this permit on the last day prior to the effective date of the Title V permit.

9. What are my obligations when I perform scheduled maintenance on air pollution control equipment?

You must perform scheduled maintenance of air pollution control equipment in accordance with OAC rule 3745-15-06(A). If scheduled maintenance requires shutting down or bypassing any air pollution control equipment, you must also shut down the emissions unit(s) served by the air pollution control equipment during maintenance, unless the conditions of OAC rule 3745-15-06(A)(3) are met. Any emissions that exceed permitted amount(s) under this permit (unless specifically exempted by rule) must be reported as deviations in the annual permit evaluation report (PER), including nonexempt excess emissions that occur during approved scheduled maintenance.

10. Do I have to report malfunctions of emissions units or air pollution control equipment? If so, how must I report?

If you have a reportable malfunction of any emissions unit(s) or any associated air pollution control system, you must report this to the [DO/LAA] in accordance with OAC rule 3745-15-06(B). Malfunctions that must be reported are those that result in emissions that exceed permitted emission levels. It is your responsibility to evaluate control equipment breakdowns and operational upsets to determine if a reportable malfunction has occurred.

If you have a malfunction, but determine that it is not a reportable malfunction under OAC rule 3745-15-06(B), it is recommended that you maintain records associated with control equipment breakdown or process upsets. Although it is not a requirement of this permit, Ohio EPA recommends that you maintain records for non-reportable malfunctions.

11. Can Ohio EPA or my local air agency inspect the facility where the emission unit(s) is/are located?

Yes. Under Ohio law, the Director or his authorized representative may inspect the facility, conduct tests, examine records or reports to determine compliance with air pollution laws and regulations and the terms and conditions of this permit. You must provide, within a reasonable time, any information Ohio EPA requests either verbally or in writing.

12. What happens if one or more emissions units operated under this permit is/are shut down permanently?

Ohio EPA can terminate the permit terms associated with any permanently shut down emissions unit. “Shut down” means the emissions unit has been physically removed from service or has been altered in such a way that it can no longer operate without a subsequent "modification" or "installation" as defined in OAC Chapter 3745-31.

You should notify Ohio EPA of any emissions unit that is permanently shut down by submitting a certification that identifies the date on which the emissions unit was permanently shut down. The certification must be submitted by an authorized official from the facility. You cannot continue to operate an emission unit once the certification has been submitted to Ohio EPA by the authorized official.

You must comply with all recordkeeping and reporting for any permanently shut down emissions unit in accordance with the provisions of the permit, regulations or laws that were enforceable during the period of operation, such as the requirement to submit a PER, air fee emission report, or malfunction report. You must also keep all records relating to any permanently shutdown emissions unit, generated while the emissions unit was in operation, for at least five years from the date the record was generated.

Again, you cannot resume operation of any emissions unit certified by the authorized official as beingpermanently shut down without first applying for and obtaining a permit pursuantto OAC Chapter 3745-31.

13. Can I transfer this permit to a new owner or operator?

You can transfer this permit to a new owner or operator. If you transfer the permit, you must follow the procedures in OAC Chapter 3745-31, including notifying Ohio EPA or the local air agency of the

change in ownership or operator. Any transferee of this permit must assume the responsibilities of the transferor permit holder.

14. Does compliance with this permit constitute compliance with OAC rule 3745-15-07, "air pollution nuisance"?

This permit and OAC rule 3745-15-07 prohibit operation of the air contaminant source(s) regulated under this permit in a manner that causes a nuisance. Ohio EPA can require additional controls or modification of the requirements of this permit through enforcement orders or judicial enforcement action if, upon investigation, Ohio EPA determines existing operations are causing a nuisance.

15. What happens if a portion of this permit is determined to be invalid?

If a portion of this permit is determined to be invalid, the remainder of the terms and conditions remain valid and enforceable. The exception is where the enforceability of terms and conditions are dependent on the term or condition that was declared invalid.

B. Facility-Wide Terms and Conditions

1. This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

   a) For the purpose of a permit-to-install document, the facility-wide terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

      (1) None.

   b) For the purpose of a permit-to-operate document, the facility-wide terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

      (1) None.

C. Emissions Unit Terms and Conditions

1. F002, Storage Piles

Operations, Property and/or Equipment Description:

loading of material onto storage piles, equipment traffic in storage area, wind erosion of pile surfaces and ground areas around piles, and load-out of material for shipment

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
storage pile operations: load-in and loadoutof storage piles, equipment traffic in storage areas and wind erosion from storage piles		
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTIO P0103626 issued 9/19/2008)	particulate emissions (PE) shall not exceed 3.91 tons per year. no visible particulate emissions except for a period of time not to exceed 1 minute during any 60-minute period best available control measures that are sufficient to minimize or eliminate visible PE of fugitive dust see b)(2)a., b)(2)b., and b)(2)f. through b)(2)j.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)c and b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
c.	OAC rule 3745-31-05(F) (PTIO P0103626 issued 9/19/2008)	emissions of particulate matter less than or equal to 10 microns in diameter (PM10) shall not exceed 1.30 tons per year. see b)(2)e.
d.	OAC rule 3745-17-07(B)(6)	there shall be no visible particulate emissions, except for a period of time not to exceed 13 minutes during any 60-minute observation period. See b)(2)l.
e.	OAC rule 3745-17-08(B), (B)(6)	reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)f)(through b)(2)i., and b)(2)k.

(2) Additional Terms and Conditions

a. Compliance with the requirements of this rule includes compliance with the requirements of OAC rule 3745-31-05(D).

b. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

c. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

d. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the calculated annual emission rate for PM10 is less than 10 tons per year taking into account the emission limitation established under OAC rule 3745-31-05(F).

e. Permit to Install and Operate P0115447 for this air contaminant source takes into account the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements for PM10 under OAC rule 3745-31-05(A)(3):

   i. restrict the throughput of materials in this emissions unit to 720,000 tons per year measured as the rolling, 12-month total quantity of material shredded and made enforceable based on a maximum of 720,000 tons per year of material shredded at emissions unit F005;

   ii. maintain minimal drop heights. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance including, but not limited to,the periodic application of water or other suitable dust suppression chemicals, the installation of storage silos, bins or other enclosed structures, or the use of canvas or other suitable coverings.

f. The permittee shall employ best available control measures on all storage pile operations for the purpose of ensuring compliance with the above-mentioned applicable PE requirements. In accordance with the permittee's application, the permittee has committed to maintain minimal drop heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance including, but not limited to,the periodic application of water or other suitable dust suppression chemicals, the installation of storage silos, bins or other enclosed structures, or the use of canvas or other suitable coverings.

g. Except during times of maintaining and dressing roadways or when utilizing the bucket as a means of moving material along the surface, the operator shall avoid dragging any front-end loader bucket along the ground needlessly. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

h. The above-mentioned control measure(s) shall be employed for any storage pile operation at each storage pile if the permittee determines, as a result of the inspection conducted pursuant to the monitoring section of this permit, that the control measure(s) are necessary to ensure compliance with the above-mentioned applicable requirements. Any required implementation of the control measure(s) shall continue during any such operation until further observation confirms that use of the measure(s) is unnecessary.

i. Implementation of the control measure(s) shall not be necessary for wind erosion of a storage pile that is covered with snow and/or ice or if precipitation has occurred that is sufficient for that day to ensure compliance with the above-mentioned applicable requirements.

j. Implementation of the control measures of e. through i. above, will be considered adequate to ensure an effective control for fugitive emissions of 75% for wind erosion and load-out, and 95% for load-inand equipment traffic.

k. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the requirements of OAC rule 3745-17-08(B).

l. The permittee shall comply with no visible particulate emissions except for a period of time not to exceed 1 minute during any 60-minute period until US EPA approves the August 3, 2006 version of OAC rule 3745-31-05. After this rule is approved, then the permittee shall comply with no visible particulate emissions, except for a period of time not to exceed 13 minutes during any 60-minute observation period.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) Except as otherwise provided in this section, the permittee shall perform inspections of each load-in operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-in inspection frequency
all	daily

(2) Except as otherwise provided in this section, the permittee shall perform inspections of all equipment traffic at each storage pile area in accordance with the following frequencies:

storage pile identification	minimum equipment traffic inspection frequency
all	daily

(3) Except as otherwise provided in this section, the permittee shall perform inspections of the wind erosion from pile surfaces associated with each storage pile in accordance with the following frequencies:

storage pile identification	minimum wind erosion inspection frequency
all	daily

(4) Except as otherwise provided in this section, the permittee shall perform inspections of each load-out operation at each storage pile in accordance with the following frequencies:

storage pile identification	minimum load-out inspection frequency
all	daily

(5) No inspection shall be necessary for wind erosion from the surface of a storage pile when the pile is covered with snow and/or ice and for any storage pile activity if precipitation has occurred that is sufficient for that day to ensure compliance with the

above-mentioned applicable requirements. Any required inspection that is not performed due to any of the above identified events shall be performed as soon as such event(s) has (have) ended, except if the next required inspection is within one week.

The purpose of the inspections is to determine the need for implementing the control measures specified in this permit for load-in and load-out of a storage pile, equipment traffic in the storage pile area and wind erosion from the surface of a storage pile. The inspections shall be performed during representative, normal storage pile operating conditionson days when the facility is operating.

(6) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

(7) The permittee shall maintain records of the following information:

a. the date and reason any required inspection was not performed, including those inspections that were not performed due to snow and/or ice cover or precipitation;

b. the date of each inspection where it was determined by the permittee that it was necessary to implement the control measures;

c. the dates the control measures were implemented; and

d. on a calendar quarter basis, the total number of days the control measures were implemented and, for wind erosion from pile surfaces, the total number of days where snow and/or ice cover or precipitation were sufficient to not require the control measure(s).

The information required in d. shall be kept separately for (i) the load-in operations, (ii) equipment traffic, (iii) the pile surfaces (wind erosion)and (iv) the load-out operations, and shall be updated on a calendar quarter basis within 30 days after the end of each calendar quarter.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitations:

3.91 tons/year of fugitive PE

1.30 tons/year of fugitive PM10

Applicable Compliance Method:

Compliance with fugitive PE and PM10 limitations shall be determined by using the emission factor equations in Section 11.19 in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 8/04), for load-in operations, Section 13.2.2, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06) for equipment traffic in the storage pile areas, Section 2.1.2 from the Ohio EPA's 9/80 Reasonably available control measures (RACM) document for losses from storage pile wind erosion, and Section 13.2.4, in Compilation of Air Pollutant Emission Factors, AP-42, Fifth Edition, Volume 1 (revised 11/06), for load-out operations. These emission limits were based on a maximum of 720,000 tons per year of material shredded at emissions unit F005, and effective control for fugitive emissions of 75% for wind erosion and load-out, and 95% for load-inand equipment traffic.

b. Emission Limitation:

There shall be no visible particulate emissions except for a period of time not to exceed 1 minute during any 60-minute period until US EPA approves the August 3, 2006 version of OAC rule 3745-31-05. After this rule is approved, then the permittee shall comply with no visible particulate emissions, except for a period of time not to exceed 13 minutes during any 60-minute observation period.

Applicable Compliance Method:

If required, compliance with the visible PE limitations for the storage piles identified above shall be determined in accordance with Test Method 22 as set forth in Appendix on Test Methods in 40 CFR, Part 60 (Standards of Performance for New Stationary Sources), with the following modifications:

i. if the observer's view is obscured and observations must be terminated prior to completing the necessary or desired observation period, the observer shall note this fact on the observation form; and the observation period shall be completed when the view of the storage pile is no longer obscured;

ii. the observer shall identify all interruptions due to rest breaks on the observation form; and

iii. observations, excluding break periods and periods of obscure vision, shall be considered continuous for the purpose of determining compliance with the visible emission limitation.

g) Miscellaneous Requirements

(1) None.

2. F003, Material Handling

Operations, Property and/or Equipment Description:

material handling - magnetic separation and conveying of nonferrous material to open storage piles, conveying of ferrous material to open storage piles and ferrous material handling.

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001 (PTIO P0103630 issued 9/19/2008)	visible fugitive particulate emissions from this emissions unit shall not exceed 10% opacity as a 3-minute average fugitive particulate emissions (PE) from this emissions unit shall not exceed 12.76pounds per hour fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10)from this emissions unit shall not exceed 4.69pounds per hour see b)(2)a. and b)(2)d.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006 (PTIO P0103630 issued 9/19/2008)	see b)(2)b. and b)(2)c.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-31-05(F)	fugitive PE, from this emissions unit shall not exceed 22.04 tons per year fugitive PM10, from this emissions unit shall not exceed 8.0 tons per year see b)(2)e.
c.	OAC rule 3745-17-07(B)(1)	visible particulate emissions of fugitive dust shall not exceed 20 % opacity as a 3-minute average. See b)(2)g.
d.	OAC rule 3745-17-08(B), (B)(3)	the permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)d. and b)(2)f.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the calculated annual emission rate for PM10 is less than 10 tons per year taking into account the PM10 emission limitation established under OAC rule 3745-31-05(F).

d. The permittee shall employ best available control measures on all material handling operations for the purpose of ensuring compliance with the above-mentioned applicable PE requirements. In accordance with the

permittee'sapplication, the permittee has committed to the maintenance of a moisture content of all processed material sufficient to meet the required visible emission limits above at all times and to maintain minimal drop heights to ensure compliance. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. The following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee:

i. maintenance of a moisture content of all processed material sufficient to meet the required visible emission limits at all times;

ii. maintain minimal drop heights to ensure compliance; and

iii. restrict the throughput of materials in this emissions unit to 720,000 tons per year measured as the rolling, 12-month total quantity of material shredded and made enforceable based on a maximum of 720,000 tons per year of material shredded at emissions unit F005.

f. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

g. The permittee shall comply with visible fugitive particulate emissions from this emissions unit shall not exceed 10% opacity as a 3-minute average until US EPA approves the August 3, 2006 version of OAC rule 3745-31-05. After this rule is approved, the permittee shall comply visible particulate emissions of fugitive dust shall not exceed 20 % opacity as a 3-minute average.

c) Operational Restrictions

(1) None.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible particulate emissions from the stack and for any visible emissions of fugitive dust from the egress points (i.e., conveyors, conveyor transfer points, separators building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(2) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

The visible fugitive particulate emissions from this emissions unit shall not exceed 10% opacity as a 3-minute average until US EPA approves the August 3, 2006 version of OAC rule 3745-31-05. After this rule is approved, the permittee shall comply visible particulate emissions of fugitive dust shall not exceed 20 % opacity as a 3-minute average.

Applicable Compliance Method:

If required, complianceshall be determined in accordance with U.S. EPA Method 9, with the following modifications:

i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;

ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;

iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions and the line of sight should be approximately perpendicular to the flow of fugitive dust and to the longer axis of the emissions; and

iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

b. Emission Limitation:

fugitive PE from this emissions unit shall not exceed12.76pounds per hour

Applicable Compliance Method:

This emission limitation was established to reflect the worst case maximum rate of fugitive emissions from this emissions unit based on a normalization of the maximum annual allowable fugitive emission rate (14.02 tons per year from conveying operations and 6.48 tons per year from fugitive process emissions in the building), the maximum process throughput rate of the shredder (224 tons per hour) and the maximum annual total process throughput rate (720,000 tons per year), as follows:

(14.02 tons/yr + 6.48tons/yr PE)(2000 lb/ton)(224 tons/hr)÷(720,000 tons/yr)

c. Emission Limitation:

fugitivePM10 from this emissions unit shall not exceed4.69pounds per hour

Applicable Compliance Method:

This emission limitation was established to reflect the worst case maximum rate of fugitive emissions from this emissions unit based on a normalization of the maximum annual allowable fugitive emission rate (5.16 tons per year from conveying operations and 2.38 tons per year from fugitive process emissions in the building), the maximum process throughput rate of the shredder (224 tons per year) and the maximum annual total process throughput rate (720,000 tons per year), as follows:

(5.16 tons/yr + 2.38tons/yr PM10)(2000 lb/ton)(224 tons/hr)÷(720,000 tons/yr)

d. Emissions Limitations:

Fugitive PE, from this emissions unit shall not exceed 22.04 tons per year

Fugitive PM10, from this emissions unit shall not exceed 8.00 tons per year

Applicable Compliance Method:

These limitationswere established by calculations adding the individual contributions of the stack and fugitive sources to reflect the full potential to emit for this emissions unitbased on a maximum of 720,000 tons per year of material shredded at emissions unit F005.

Fugitive PE and PM10 limitations shall be determined by calculations adding the individual contributions of the fugitive sources as follows:

i. conveyor belt transfer points were estimated using the emission factors taken from AP-42, Chapter 11.19.2. Table 11.19.2-2 EMISSION FACTORS FOR CRUSHED STONE PROCESSING OPERATIONS dated 8/04: 0.0030 pound PE per ton uncontrolled and 0.00014 pound PE per ton controlled by wet suppression, 0.0011 pound PM10 per ton uncontrolled and 0.000046 pound per ton PM10 controlled by wet suppression and 720,000 tons per year of material shredded at emissions unit F005;

ii. emissions from the z-box, poker picker, magnet, vibrator, combining chute and manual sorting were typified as the equivalent of 12 transfer conveyor belt points;

iii. 50%effective control was allowed based on a building enclosure; and

iv. PM10 was assumed to comprise 35% of the PE by weight.

g) Miscellaneous Requirements

(1) None.

3. F004, Torching Stations

Operations, Property and/or Equipment Description:

12 torching stations outside, used to disassemble miscellaneous metal parts before they are fed to the shredder inside, 7 torching stations in enclosed building

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. None.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	The requirements of this rule include compliance with the requirements of OAC rule 3745-31-05(F). see b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii)	see b)(2)b. and b)(2)c.
a.	OAC rule 3745-31-05(F) (PTIO P0103630 issued 9/19/2008)	fugitive particulate emissions (PE) shall not exceed 4.99 tons per year fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 4.99 tons per year see b)(2)d.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
b.	OAC rule 3745-17-07(B)(1)	visible fugitive particulate emissions from this emissions unit shall not exceed 20% opacity as a 3-minute average
c.	OAC rule 3745-17-08(B), (B)(3)	the permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the calculated annual emission rate for PM10 is less than 10 tons per year taking into account the PM10 emission limitation established under OAC rule 3745-31-05(F).

d. The permittee has the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements for PM10 under OAC rule 3745-31-05(A)(3)(b):

i. The permittee shall have fire extinguishers or otherappropriate suppression methods located nearany cutting stations whichshall be employed promptly to extinguish anyaccidental fires caused by cutting operations.

ii. The permittee shall employ accepted practices when cutting torches are beingused to minimize resulting visible emissions. Such practices shall include, but notbe limited to, the following items: cutting metal that is, to the extent practicable, clean of any oil(s) or othercombustible fluids, the minimization of flame impingement with the ground, andthe use of the appropriately sized cutting torch(s).

iii. Oxygen lances or powder metal cutting will not be used.

Implementation of these control measures will be considered adequate to restrict controlled potential particulate emissions to less than 10.0 tons per year. Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

(1) The permittee shall have fire extinguishers or other appropriate suppression methods located near any cutting station(s) which shall be employed promptly to extinguish any accidental fires caused by cutting operations.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain daily records that document, while the emissions unit was in operation, any time periods when:

a. fire extinguishers or other appropriate suppression methods were not located near any cutting station(s); and/or

b. fire extinguishers or other suppression methods were not employed promptly to extinguish any accidental fires caused by cutting operations when the emissions unit was in operation.

(2) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., building windows, doors, roof monitors, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended. The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(3) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

Visible emissions of fugitive dust shall not exceed 20 percent opacity as a three-minute average.

Applicable Compliance Method:

If required, compliance shall be determined in accordance with U.S. EPA Method 9, with the following modifications:

i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;

ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;

iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions and the line of sight should be approximately perpendicular to the flow of fugitive dust and to the longer axis of the emissions; and

iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

b. Emission Limitation:

fugitivePE shall not exceed 4.99 tons per year

fugitivePM10 shall not exceed 4.99 tons per year

Applicable Compliance Method:

Compliance with the fugitive PE and PM10 limitations shall be determined by multiplying the fugitive emission factor for cutting clean steel from theScrap Recycling Industries, Inc. "Title V Applicability Workbook" Appendix D, Table D-5 dated 1996 (0.06 lb/hr),by the number of torching stations (19) and by the maximum annual operating hours for this emissions unit (8,760 hours per year) divided by 2000 pounds per ton.

g) Miscellaneous Requirements

(1) None.

4. F005, Scrap MetalShredder

Operations, Property and/or Equipment Description:

224 TPH Scrap metal shredder with electric motor

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. None.

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)d., b)(2)e., b)(2)f., c)(3), d)(1), d)(2), e)(1), f)(1)d.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3) (PTIO P0103630 issued 9/19/2008)	emissions of volatile organic compounds (VOC) from this emissions unit shall not exceed 55.33 pounds per hour see b)(2)d. and e.
b.	OAC rule 3745-31-05(A)(3), as effective 11/30/2001	fugitive particulate emissions (PE) shall not exceed 0.54 pound per hour fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.19 pound per hour see b)(2)a.
c.	OAC rule 3745-31-03(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)b. and b)(2)c.
d.	OAC rule 3745-31-05(D)	visible fugitive particulate emissions from

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		this emissions unit shall not exceed 0% opacity as a 3-minute average fugitive PE shall not exceed 0.86 ton per year fugitive PM10 emissions shall not exceed 0.30 ton per year emissions of VOC from this emissions unit shall not exceed 88.92tons per rolling, 12-month period see b)(2)e. and b)(2)f.
e.	OAC rule 3745-17-07(B)(1)	the emission limitation required by this applicable rule is less stringent than the emission limitation established pursuant to OAC rule 3745-31-05(D)
f.	OAC rule 3745-17-08(B), (B)(3)	the permittee shall utilize reasonably available control measures that are sufficient to minimize or eliminate visible emissions of fugitive dust see b)(2)g.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 emissions from this air contaminant source since the calculated annual

emission rate for PM10 is less than 10 tons per year taking into account the federally enforceable rule limit of OAC rule 3745-31-05(D).

d. The permittee shall employ best available control measures on all shredding operations for the purpose of ensuring compliance with the above-mentioned applicable VOC requirements. In accordance with the permittee's application, the permittee has committed to a program of operational practices designed to limit the amount of VOC entering the airstream with the scrap including the removal (draining), tothe extent practicable, of combustibleand VOC-containing fluids from uncrushed autos, communication to upstream suppliers of OmniSource's Prohibited Materials Program policies**,** and a "once through" water usage in the shredder

Nothing in this paragraph shall prohibit the permittee from employing other control measures to ensure compliance.

e. Prior to shredding uncrushed automobiles, appliances, scrap metal, etc., the following items shall be removed (to the extent practicable):

i. gasoline tanks;

ii. batteries;

iii. all combustible fluids;

iv. all refrigerants from air conditioning systems; and

v. anymercury containing convenience switches or components.

f. The permittee has agreed to the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee:

i. restrict the throughput of materials in this emissions unit to 720,000 tons per year measured as the rolling, 12-month total quantity of material;

ii. removal (draining), to the extent practicable,of combustible fluids from materials being processed;

iii. water sprays directed at the feed rolls and rotor; and

iv. "once through" water usage in the shredder.

g. Implementation of the above-mentioned control measures in accordance with the terms and conditions of this permit is appropriate and sufficient to satisfy the reasonably available technology requirements of OAC rule 3745-17-08.

c) Operational Restrictions

(1) Water shall be injected directly into the shredder at the feed rolls and rotor to control dust emissions. Monitoring, recordkeeping and reporting requirements for the water

injection system are not required due to the water injection system being an integral part of the shredding process.

(2) The moisture content of all processed material shall be maintained sufficiently high enough to meet the required visible emission limits above at all times.

(3) The maximum annual production rate for this emissions unit shall not exceed 720,000 tons per year, based upon a rolling, 12-month summation of the production rates.

d) Monitoring and/or Recordkeeping Requirements

(1) The permittee shall maintain monthly records of any failure to remove prior to shredding automobiles, appliances, scrap metal, etc., the following items:

a. gasoline tanks;

b. batteries;

c. all combustible fluids;

d. all refrigerants from air conditioning systems; and

e. allmercury containing convenience switches or components.

(2) The permittee shall maintain monthly records of the following information:

a. the production rate for each month; and

b. the rolling, 12-month summation of the production rates.

(3) The permittee shall perform daily checks, when the emissions unit is in operation and when the weather conditions allow, for any visible emissions of fugitive dust from the egress points (i.e., feeder, shredder, discharge chute, etc.) serving this emissions unit. The presence or absence of any visible emissions shall be noted in an operations log. If visible emissions are observed, the permittee shall also note the following in the operations log:

a. the location and color of the emissions;

b. whether the emissions are representative of normal operations;

c. if the emissions are not representative of normal operations, the cause of the abnormal emissions;

d. the total duration of any visible emission incident; and

e. any corrective actions taken to minimize or eliminate the visible emissions.

If visible emissions are present, a visible emission incident has occurred. The observer does not have to document the exact start and end times for the visible emission incident under item (d) above or continue the daily check until the incident has ended.

The observer may indicate that the visible emission incident was continuous during the observation period (or, if known, continuous during the operation of the emissions unit). With respect to the documentation of corrective actions, the observer may indicate that no corrective actions were taken if the visible emissions were representative of normal operations, or specify the minor corrective actions that were taken to ensure that the emissions unit continued to operate under normal conditions, or specify the corrective actions that were taken to eliminate abnormal visible emissions.

(4) For emission points for which the daily checks show emissions that are representative of normal operation for 30 consecutive operating days, the required frequency of visible emissions checks may be reduced to weekly (once per week, when the emissions unit is in operation). If a subsequent check of such emission point by the permittee or an Ohio EPA inspector indicates abnormal emissions, the frequency of emissions checks shall revert to daily for that emission point until such time as there are 30 consecutive operating days of normal visible emissions.

e) Reporting Requirements

(1) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the potential to emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the rolling, 12-month production rate limitation; and

ii. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative production rate levels;

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(2) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit.

The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emission Limitation:

visible fugitive particulate emissions from this emissions unit shall not exceed 0% opacity as a 3-minute average

Applicable Compliance Method:

If required, complianceshall be determined in accordance with U.S. EPA Method 9, with the following modifications:

i. the data reduction and average opacity calculation shall be based upon sets of twelve consecutive visible emission observations recorded at 15-second intervals;

ii. opacity observations shall be made from a position that provides the observer a clear view of the emissions unit and the fugitive dust, with the sun behind the observer;

iii. where possible, visible opacity observations shall be conducted at a position of at least fifteen feet from the source of emissions and the line of sight should be approximately perpendicular to the flow of fugitive dust and to the longer axis of the emissions; and

iv. the visible opacity observations shall be made for the point of highest opacity within the fugitive dust emitted from the source.

b. Emission Limitation:

fugitivePE shall not exceed 0.86 ton per year

fugitivePM10 shall not exceed 0.30 ton per year

Applicable Compliance Method:

These limitationswere established to reflect the full potential to emit for this emissions unitbased on a maximum of 720,000 tons per year of material shredded utilizing a company supplied emissions factor (0.0024 lb PE/ton) determined during stack testing of a similar emissions unit. PM10 was established as 35% of the PE emissions.

If required, the permittee shall demonstrate compliance with the short term emission limitations (lb/ton) by construction of a temporary total enclosure

designed to satisfy the requirements of Method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Stack testing will be performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A and Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

c. Emission Limitation:

emissions of VOC from this emissions unit shall not exceed 55.33 pounds per hour

This limitation was established to reflect the full potential to emit for this emissions unit utilizing a company supplied emissions factor (0.247 lb VOC/ton) determined during stack testing of a similar emissions unit.

If required, the permittee shall demonstrate compliance with the short term emission limitations (lb/ton) by construction of a temporary total enclosure designed to satisfy the requirements of Method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Stack testing will be performed in accordance with Methods 1 thru 4 and 25 or 25 A, as appropriate, of 40 CFR Part 60, Appendix A, and the procedures outlined in OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

d. Emission Limitation:

emissions of VOC from this emissions unit shall not exceed 88.92tons per rolling, 12-month period

Applicable Compliance Method:

These limitationswere established to reflect the full potential to emit for this emissions unitbased on a maximum of 720,000 tons per rolling, 12-month period of material shredded utilizing a company supplied emissions factor (0.247 lb VOC/ton) determined during stack testing of a similar emissions unit.

If required, the permittee shall demonstrate compliance with the short term emission limitations (lb/ton) by construction of a temporary total enclosure designed to satisfy the requirements of Method 204, as specified in 40 CFR Part

51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Stack testing will be performed in accordance with Methods 1 thru 4 and 25 or 25 A, as appropriate, of 40 CFR Part 60, Appendix A, and the procedures outlined in OAC rule 3745-21-10(C). Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

e. Emission Limitation:

fugitive particulate emissions (PE) shall not exceed 0.54 pound per hour;

fugitive particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.19 pound per hour

f. Applicable Compliance Method:

The allowable particulate emissions limitation was developed by multiplying the maximum process weight rate (224 tons/hr) by the particulate emission factor supplied by the permittee based on testing at a similar source (0.0024 lb/ton) with inherent water spray control. The allowable PM10 emission rate was developed by multiplying the allowable particulate emissions limitation (0.54 lb/hr) by the estimated decimal fraction of PM10 contained in PE for this emissions unit (0.35).

If required, the permittee shall demonstrate compliance with the short term emission limitations (lb/ton) by construction of a temporary total enclosure designed to satisfy the requirements of Method 204, as specified in 40 CFR Part 51, Appendix M, or the permittee may request to use an alternative method or procedure for the determination in accordance with the USEPA's "Guidelines for Determining Capture Efficiency," dated January 9, 1995. (The Ohio EPA will consider the request, including an evaluation of the applicability, necessity, and validity of the alternative, and may approve the use of the alternative if such approval does not contravene any other applicable requirement.) Stack testing will be performed in accordance with Methods 1 thru 5 of 40 CFR Part 60, Appendix A and Methods 201 and 202 of 40 CFR Part 51, Appendix M. Alternate, equivalent methods may be used upon approval by the Toledo Division of Environmental Services.

g) Miscellaneous Requirements

(1) None.

5. K001, Spray Booth

Operations, Property and/or Equipment Description:

Miscellaneous coating operations

a) This permit document constitutes a permit-to-install issued in accordance with ORC 3704.03(F) and a permit-to-operate issued in accordance with ORC 3704.03(G).

(1) For the purpose of a permit-to-install document, the emissions unit terms and conditions identified below are federally enforceable with the exception of those listed below which are enforceable under state law only.

a. c)(4) and d)(4)

(2) For the purpose of a permit-to-operate document, the emissions unit terms and conditions identified below are enforceable under state law only with the exception of those listed below which are federally enforceable.

a. b)(1)c., b)(2)d., c)(3), d)(2), d)(3), e)(2), and f)(1)e.

b) Applicable Emissions Limitations and/or Control Requirements

(1) The specific operation(s), property, and/or equipment that constitute each emissions unit along with the applicable rules and/or requirements and with the applicable emissions limitations and/or control measures are identified below. Emissions from each unit shall not exceed the listed limitations, and the listed control measures shall be specified in narrative form following the table.

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
a.	OAC rule 3745-31-05(A)(3), as effective 11//30/2001	Particulate emissions (PE) shall not exceed 0.05 pound per day. Particulate matter emissions less than or equal to 10 microns in diameter (PM10) shall not exceed 0.05 pound per day. Volatile organic compound (VOC) emissions from coatings shall not exceed 48.8 pounds per day as applied. see b)(2)a.
b.	OAC rule 3745-31-05(A)(3)(a)(ii), as effective 12/01/2006	see b)(2)b. and b)(2)c.
c.	OAC rule 3745-31-05(D)	Particulate emissions (PE) from the stack serving this emissions unit shall not exceed 0.01 ton per year Particulate matter emissions less than or

	Applicable Rules/Requirements	Applicable Emissions Limitations/Control Measures
		equal to 10 microns in diameter (PM10) from the stack serving this emissions unit shall not exceed 0.01 ton per year The emissions of volatile organic compound (VOC) from the stack serving this emissions unit shall not exceed 3.66 tons per rolling 12-month period, including both coatings and cleanup materials. see b)(2)d.
d.	OAC rule 3745-17-07(A)(1)	a) Visible emissions from the stack serving this emissions unit shall not exceed 20% opacity, as a six - minute average, except as specified by rule.
e.	OAC rule 3745-17-11(B)(1)	PE from the stack serving this emissions unit shall not exceed 0.551 pound per hour. see b)(2)f.
f.	OAC rule 3745-17-11(C)	see c)(2) and d)(5)
g.	OAC rule 3745-21-09(U)(2)(e)(iii)	See b)(2)e.

(2) Additional Terms and Conditions

a. The permittee has satisfied the Best Available Technology (BAT) requirements pursuant to Ohio Administrative Code (OAC) paragraph 3745-31-05(A)(3), as effective November 30, 2001, in this permit. On December 1, 2006, paragraph (A)(3) of OAC rule 3745-31-05 was revised to conform to the Ohio Revised Code (ORC) changes effective August 3, 2006 (Senate Bill 265 changes), such that BAT is no longer required by State regulations for National Ambient Air Quality Standards (NAAQS) pollutant(s) less than ten tons per year. However, that rule revision has not yet been approved by U.S. EPA as a revision to Ohio's State Implementation Plan (SIP). Therefore, until the SIP revision occurs and the U.S. EPA approves the revisions to OAC rule 3745-31-05, the requirement to satisfy BAT still exists as part of the federally-approved SIP for Ohio. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, then these emission limitations/control measures no longer apply.

b. This rule paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

c. The BAT requirements under OAC rule 3745-31-05(A)(3) do not apply to the PM10 and VOC emissions from this air contaminant source since the calculated annual emission rate for PM10 and VOC is less than 10 tons per year taking into account the federally enforceable rule limit of OAC rule 3745-31-05(D).

d. The permittee has agreed to the following voluntary restrictions (including the use of any applicable air pollution control equipment) as proposed by the permittee for the purpose of avoiding Best Available Technology (BAT) requirements for PM10 under OAC rule 3745-31-05(A)(3)(b):

i. the permittee shall not use more than 10 gallons of coating material per day;

ii. the permittee shall not use more than 1,482 gallons of coating material per rolling, 12-month period;

iii. the permittee shall utilize a maximum 4.88 pound of VOC per gallon coating material, as applied, for the coating of miscellaneous metal parts;

iv. the permittee shall utilize a maximum 7.17 pound of VOC per gallon clean-up material and limit the use of VOC containing clean-up materials to 12 gallons per rolling, 12-month periodfor parts cleaning, thinning or reducing coatings, to clean paint guns, booth walls, etc.;

v. all coating operations will utilize an airless spray gun; and

vi. all coating operations will utilize a paint spray booth equipped with an exhaust gas filtration system.

e. The permittee shall not use more than 10 gallons of coating material per day for the coating of miscellaneous metal parts.

f. The requirements of this rule will no longer apply once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05. Once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05, the permittee will be required to comply with the requirements of OAC rule 3745-17-11(C), since the exemption provided under OAC rule 3745-17-11(C)(3) will no longer be in effect.

c) Operational Restrictions

(1) The permittee shall operate the dry filtration system for control of particulate emissions whenever this emissions unit is in operation.

This paragraph becomes void once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

(2) This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

a. The permittee shall operate the dry filtration system for the control of particulate emissions whenever this emissions unit is in operation and shall maintain the dry

particulate filterin accordance with the manufacturer's recommendations, instructions, and/or operating manual(s), with any modifications deemed necessary by the permittee.

b. In the event the particulate filter system is not operating in accordance with the manufacturer's recommendations, instructions, or operating manual, with any modifications deemed necessary by the permittee,the control device shall be expeditiously repaired or otherwise returned to these documented operating conditions.

(3) The maximum annual usage rate for this emissions unit shall not exceed 1,482 gallons per year of VOC from coatings and 12 gallons per year of cleanup solvents, based upon a rolling, 12-month summation of the usage rates.

(4) Prior to the initialuse of any coating in this coating line, the permittee shall determine that the coating meets the toxic screening criteria described below.

Purpose: The purpose of this test is to evaluate coatings to determine if the chemical compounds in the coatings would be emitted at acceptable levels for the general permit.

Data Needed: (1) MSDS sheet for each coating to be evaluated. (2) Information on the maximum coating usage rate for the line as discussed in Step 1 below.

Step 1. Using the following factors, calculate the maximum coating usage rate in terms of gallons per hour:

a. Assume the coating line operates at its maximum speed while still making usable product.

b. Assume the coating line is operating at its largest coating laydown rate. This would typically be accomplished by assuming the coating line is painting the largest part available.

Step 2. Review the material safety data sheet (MSDS) for the coating. Note each chemical compound listed its TLV and the percent by weight of the chemical compound in the coating.

Step 3. Determine if any of the chemical compounds listed in the MSDS are also listed in the following table. If any of the chemical compounds are listed in the table, then calculate the maximum annual emission of that compound by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. Then multiply the result by 8760 hours per year. The result will be in pounds per year.

Check to see if the calculated emission rate is less than the allowable emission rate found in the below table. If all of the compounds emitted have a maximum annual emission of less than the allowed rate, then move on to step 4. If any of the compounds are emitted at a rate higher than the allowed emission rate, then contact your appropriate District Office or local air agency contact to determine if you can use the coating.

Chemical Compound	CAS	Molecular Weight (MW)	Allowed Emission Rate (lb/year)
Arsenic compounds, as As	7440-38-2	74.92	1.70
Benzene	71-43-2	78.11	1100
Benzidine	92-87-5	184.23	5.60
Benzo(a)pyrene	50-32-8	252.30	6.90
Beryllium (and Be compounds)	7440-41-7	9.01	0.350
Cadmium	7440-43-9	112.4	5.20
Chromium	7440-47-3	varies	0.690
Hexachlorobenzine (HCB)	118-74-1	289.78	35.0
Mercury (and Hg compounds)	7439-97-6	200.59	0.1
Nickel (Ni subsulfide)	12035-72-2	240.19	17.0
Polychlorinated dibenzo-p-dioxins	1746-01-6	varies	0.030
Polychlorinated dibenzofurans	132-64-9	varies	0.030
Polychlorinated biphenyls (PCBs, aroclors)	1336-36-3	varies	87.0
Vinyl chloride	75-01-4	62.50	2000

Step 4. Find all of the chemical compounds in the coating that have a listed American Conference of Governmental Industrial Hygienists (ACGIH) Threshold Limit Value (TLV). For each chemical compound with a listed TLV (other than those in the above table), calculate the maximum short-term emission rate by multiplying the maximum coating usage rate times the percent by weight of each chemical compound. The result should be in terms of pounds of the chemical compound per hour.

Step 5. Determine if the compound will be emitted at or below the acceptable rate. This is done by searching the following table for the chemical compound's TLV and then determining the maximum allowed emission rate listed in the below table. (Note. If the TLV is listed as ppm, then convert the TLV to $\mu g/m^3$ by using the following formula: (TLV in ppm)x(MW)x(1000)/24.45 = TLV in $\mu g/m^3$; where MW is the molecular weight of the compound.) This table lists the allowable emission rates for compounds with a TLV between the high range and low range. Compare the maximum calculated short-term emission rate of each chemical compound to the allowed emission rate in the table. If the maximum emission rate is less than the allowed emission rate, then the chemical compound is emitted at an acceptable rate.

TLVRange ($\mu g/m^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
15	1	0.000067
30	15	0.0010
60	30	0.0020
120	60	0.0040
240	120	0.0080

TLVRange ($\mu g/m^3$) (The TLV must be less than the high value listed and greater than or equal to the low value listed)		Allowed Emission Rate (lb/hr)
480	240	0.0160
960	480	0.0320
1,920	960	0.0640
3,840	1,920	0.128
7,680	3,840	0.256
15,360	7,680	0.512
30,720	15,360	1.02
61,440	30,720	2.05
122,880	61,440	4.10
245,760	122,880	8.19
491,520	245,760	16.4
983,040	491,520	32.8
1,966,080	983,040	65.5
3,932,160	1,966,080	131

Step 6. Check each chemical compound that has a listed TLV. If all compounds are emitted at a rate less than the allowed emission rate, then the coating passes the toxic screening test and can be used under this permit. If one or more of the chemical compounds are emitted at a rate greater than the allowed emission rate, then you should contact your appropriate District Office or local air agency contact to determine if you can use the coating.

d) Monitoring and/or Recordkeeping Requirements

(1) On any day during which the emissions unit is in use, thepermittee shall maintain daily records that document any time periods when the dry filtration system was not in service when the emissions unit was in operation.

This paragraph becomes void once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

(2) On any day during which the emissions unit is in use, thepermittee shall collect and record the following information each day for this emissions unit:

a. the name and identification number of each coating employed in the coating line;

b. the mass of VOC per volume of each coating (excluding water and exempt solvents), as applied;

c. the volume, in gallons, of each coating employed in the coating line; and

d. the total volume, in gallons, of all of the coatings employed in the coating line.

These records shall be maintained for a period of not less than three years.

(3) The permittee shall collect and record the following information for each month for this emissions unit:

a. the company identification of each VOC containing cleanup material employed;

b. the VOC content of each cleanup material employed, in pounds per gallon;

c. the number of gallons of each VOC containing cleanup material employed;

d. the total volume, in gallons, of all of the coatings employed in the coating line; and

e. the rolling, 12-month summation of the coating usage rates.

(4) The permittee shall collect and record the results of any toxic screening evaluations done per c)(4).

(5) This paragraph applies once U.S. EPA approves the December 1, 2006 version of OAC rule 3745-31-05 as part of the State Implementation Plan.

a. The permittee shall maintain documentation of the manufacturer's recommendations, instructions, or operating manuals for the dry particulate filter, along with documentation of any modifications deemed necessary by the permittee. These documents shall be maintained at the facility and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

b. The permittee shall conduct periodic inspections of the dry particulate filter to determine whether it is operating in accordance with the manufacturer's recommendations, instructions, or operating manuals with any modifications deemed necessary by the permittee or operator. These inspections shall be performed at a frequency that shall be based upon the recommendation of the manufacturer and the permittee shall maintain a copy of the manufacturer's recommended inspection frequency and it shall be made available to the Ohio EPA upon request.

c. In addition to the recommended periodic inspections, not less than once each calendar year the permittee shall conduct a comprehensive inspection of the dry particulate filter while the emissions unit is shut down and perform any needed maintenance and repair to ensure that it is operated in accordance with the manufacturer's recommendations.

d. The permittee shall document each inspection (periodic and annual) of the dry particulate filter system and shall maintain the following information:

i. the date of the inspection;

ii. a description of each/any problem identified and the date it was corrected;

iii. a description of any maintenance and repairs performed; and

iv. the name of person who performed the inspection.

These records shall be maintained at the facility for not less than five years from the date the inspection and any necessary maintenance or repairs were completed and shall be made available to the appropriate Ohio EPA District Office or local air agency upon request.

e. The permittee shall maintain records that document any time periods when the dry particulate filter was not in service when the emissions unit(s) was/were in operation, as well as, a record of all operations during which the dry particulate filter was not operated according to the manufacturer's recommendations with any documented modifications made by the permittee. These records shall be maintained for a period of not less than five years and shall be made available to the Ohio EPA upon request.

e) Reporting Requirements

(1) The permittee shall notify the Director (Toledo Division of Environmental Services) in writing of any daily record showing that the coating line employed more than the applicable maximum daily coating usage limit of 10 gallons per day. The notification shall include a copy of such record and shall be sent to the Director (Toledo Division of Environmental Services) within 45 days after the exceedance occurs.

(2) The permittee shall submit quarterly deviation (excursion) reports that identify:

a. all deviations (excursions) of the following emission limitations, operational restrictions and/or control device operating parameter limitations that restrict the Potential to Emit (PTE) of any regulated air pollutant and have been detected by the monitoring, record keeping and/or testing requirements in this permit:

i. all exceedances of the 4.88 pounds of VOC per gallon of coating limitation;

ii. all exceedances of the 12 gallons per rolling, 12-month period of VOC containing clean up materials or solvents limitation;

iii. all exceedances of the rolling, 12-monthcoating usage rate limitation; and

iv. for the first 12 calendar months of operation or the first 12 calendar months following the issuance of this permit, all exceedances of the maximum allowable cumulative coating usage rate levels.

b. the probable cause of each deviation (excursion);

c. any corrective actions that were taken to remedy the deviations (excursions) or prevent future deviations (excursions); and

d. the magnitude and duration of each deviation (excursion).

If no deviations (excursions) occurred during a calendar quarter, thepermittee shall submit a report that states that no deviations (excursions) occurred during the quarter.

The quarterly reports shall be submitted,electronically through Ohio EPA Air Services, each year by January 31 (covering October to December), April 30 (covering January to March), July 31 (covering April to June), and October 31 (covering July to September), unless an alternative schedule has been established and approved by the Director (the appropriate District Office or local air agency).

(3) The permittee shall submit an annual Permit Evaluation Report (PER) to the Ohio EPA. The PER must be completed electronically and submitted via the Ohio EPA e-Business Center: Air Services by the due date identified in the Authorization section of this permit. The permit evaluation report shall cover a reporting period of no more than twelve months for each air contaminant source identified in this permit.

f) Testing Requirements

(1) Compliance with the Emissions Limitations and/or Control Requirements specified in section b) of these terms and conditions shall be determined in accordance with the following methods:

a. Emissions Limitation:

10 gallons per day total coating usage

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(2).

b. Emissions Limitation:

4.88 pounds of VOC per gallon of coating

Applicable Compliance Method:

Compliance shall be based upon the record keeping specified in d)(3).

If required, the permittee shall demonstrate compliance through the methods and procedures of OAC rule 3745-21-10(B).USEPA Methods 24 shall be used to determine the VOC contents of the coatings. If, pursuant to Method 24 as outlined in 40 CFR Part 60, Appendix A, an owner or operator determines that Method 24 cannot be used for a particular coating, the permittee shall so notify the Administrator of the USEPA and shall use formulation data for that coating to demonstrate compliance until the USEPA provides alternative analytical procedures or alternative precision statements for Method 24.

c. Emissions Limitation:

3.66tons per year of VOC emissions from coatings and cleanup materials

Applicable Compliance Method:

This limitation was established to reflect the full potential to emit for this emissions unitbased on a maximum coating usage of 1,482gallons per rolling, 12-month period utilizing a maximum 4.88 pounds of VOC per gallon coating material, as applied, and the maximum usage of 12 gallons per rolling, 12-month period utilizing a maximum of 7.17 pounds of VOC per gallon of cleaning materials employed.

Compliance shall be based upon the record keeping specified in d)(3).

d. Emission Limitation:

0.551 lb of PE per hour

Applicable Compliance Method:

To determine the worst case PE rate, the following equation shall be used:

E = maximum coating solids usage rate, in pounds per hour, x (1-TE) x (1-CE)

Where E = PE rate (lb/hr);

TE = fractional transfer efficiency, which is the ratio of the amount of coating solids deposited on the coated part to the amount of coating solids used (0.80)based on emission factors specified in USEPA reference document AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors,Table 4.2.2.4-2. ESTIMATED CONTROL EFFICIENCIES FOR METAL COATING LINES dated 1/95);

CE = fractional control efficiency of the control equipment (0.99).

When requested by the Ohio EPA, the permittee shall demonstrate compliance with the above emissions limitation pursuant to OAC rule 3745-17-03(B)(10).

e. Emission Limitation:

0.01 ton of PE per year

0.01 ton of PM10 per year

Applicable Compliance Method:

These limitationswere established to reflect the full potential to emit for this emissions unitbased on a maximum application rate of 1,482 gallons per rolling, 12-month period of material. Compliance with the PE and PM10 limitations shall be determined utilizing factors from AP-42 Table 4.2.2.1-2 TYPICAL DENSITIES AND SOLIDS CONTENTS OF COATINGS as follows: multiply the maximum coating usage rate (1,482 gallons per year) by the characteristic enamel density (7.6 pounds per gallon), by the characteristic solids content (0.30 pound of solid

per pound of coating), by 1 minus the characteristic transfer efficiency (1-80%), by 1 minus the control efficiency (1-99%) and divide by 2000 pounds per ton.

f. Emission Limitation:

VOC emissions from coatings shall not exceed 48.8 pounds per day as applied.

Applicable Compliance Method:

This emission limitation was developed by multiplying the maximum daily coating usage rate (10 gal/day) by the maximum VOC content of coating as applied (4.88 lb/gal). Compliance with this emissions limitation may be assumed provided the maximum VOC content and daily coating usage restrictions specified under b)(2)d. are not exceeded.

g. Emission Limitation:

PE shall not exceed 0.05 lb/day; PM10 emissions shall not exceed 0.05 lb/day

Applicable Compliance Method:

This emissions limitation was developed to reflect the potential to emit by multiplying the maximum daily coating usage rate (10 gal/day) by the maximum paint density (7.6 lb/gal) multiplied by the maximum solids content (0.30 lb solids/lb coating), multiplied by one minus the decimal fraction transfer efficiency (1-0.80), multiplied by one minus the decimal fraction control efficiency (1-0.99), and divided by 2,000 pounds per ton.

g) Miscellaneous Requirements

(1) None.